| Name | Organization | Comment |
|------|--------------|---------|
| | | Will the SRP format make distinctions based on the application format? |
| | | Will there be a clarification of the cutoff of applicable versions of documents that should be addressed by an application? |
| | | Concerning channel independence, why has NRC taken an exception to IEEE Std 7-4.3.2-2003 Annex E? The SRP should not rule out bidirectional communication. The SRP should discuss the acceptance criteria and the technical issues concerning bidirectional communication. |
| | | Any workstation in the control room should be able to be used for monitoring and taking actions during an accident. |
| | | The SRP should include more details on cyber security. Should NEI-0404 be referenced? NEI-0404 is not a public document because it has been declared to be sensitive. |
| | | The definition of software safety should be included in the SRP. |
| | | The SRP should include details of the ITAAC audit process. |
| | | Appendix 7.0-A contains too much detail of the review. Examples are on page 3 the review of test procedures and the results has too much detail, item 3 is formatted differently from the other items. This language would elevate the referenced BTP to the equivalent of a regulation. Another area is on page 7 concerning PDS. |
| | | Technical specifications should give credit for self testing and self monitoring. Does the SRP limit testing or provide relief from requirements? |
| | | SRP Section 7.1, page 7 should be more consistent. |
| | | What is the status of the BTP 7-19 statement on leak before break? NEI will provide information concerning the EPRI document precedent. |
| | | BTP 7-19 should address single platforms that are used in multiple safety applications. Echelons of defense should be defined in BTP 7-19 and Section 7.0-A. Echelons of defense should consider how the plant operates. |
| Wes Bowers | Exelon | What is the basis of the information in BTP 7-19 on page 3 displays and controls and on page 6 on hard wired instrumentation? |
| John Granger | Florida Power and Light | Section 7.0-A should address human factors interface. |
| John Granger | Florida Power and Light | Is BTP 7-19 Defense-In-Depth and Diversity applicable to non-safety control systems? |

| Name | Organization | Comment |
|---|---|---|
| John Granger | Florida Power and Light | BTP 7-19, on page 3, states, "The above position is based on the NRC concern that software design errors are a credible source of common-mode failures." The basis for this conclusion should be explained assuming a rigorous V&V, FAT, and Functional testing of the software are completed. Why are hardware design errors not a source of potential common-mode failures? |
| | | A consistent definition of safe shutdown is needed between Sections 7.1 and 7.4. Section 7.1 defines safe shutdown as cold shutdown and Section 7.4 does not define safe shutdown. Some current plants use hot shutdown and some use cold shutdown. |
| | | Is the imposition of IEEE 603 necessary on equipment that is not taken credit for safe shutdown? |
| David Hooten | Progress Energy | If the SRP will be formally revised just once, in the March 07 time frame, please consider allowing public comment on at least the Priority 1 sections, since you anticipate having them written months in advance of March 07. |
| Ron Jarrett | TVA | IEEE 7-4.3.2 is specific to protection systems. It is referenced as a potential topic for Section 7.5. Is it going to be applied to non-protection systems, such as PAM, or is it just guidance? |
| Ron Jarrett | TVA | In BTP 7-12 is plant performance date (pre or post startup) for new plants to determine instrument drift going to be required? |
| | | What is the guidance for use of other than historical data for drift in determining surveillance intervals for new instrumentation? |
| | NEI - WG | It sounds like the NRC reviewers would want to review test data, such as factory acceptance test data as part of the DC or COLA approval. If SR software was developed under IE SQA process, why should NRC approval of the platform (DC) or application (COL) need test data, such as FAT data? |